



Winston H. Hickox  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board Los Angeles Region

Over 50 Years Serving Coastal Los Angeles and Ventura Counties

Recipient of the 2001 Environmental Leadership Award from Keep California Beautiful

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address <http://www.swrcb.ca.gov/rwqcb4>



Gray Davis  
Governor

January 22, 2002

Mr. Steve Shultz  
Shultz Steel Company  
5321 Firestone Boulevard  
South Gate, CA 90280

via Certified Mail  
Return Receipt Requested  
Claim Number 7001 0360 0000 6912 2825

**NOTICE OF VIOLATION – of the State's General Permit for *Discharges of Storm Water Associated with Industrial Activities* (Order No. 97-03-DWQ; NPDES No. CAS000001; WDID No. 4 19S 002437).**

Dear Mr. Shultz:

Your industrial facility located at 5321 Firestone Boulevard, South Gate, California and identified by the above-listed WDID number, is subject to the requirements of the NPDES General Permit for Storm Water Discharges Associated with Industrial Activities (Permit). The Permit requires that a property owner or authorized representative sign a Notice of Intent (NOI) to comply with the requirements of the Permit. The NOI serves as certification to the State of California that the industrial facility owner and agents have read the Permit and will comply with all requirements of the Permit. Whenever any changes of information occur at the facility, an operator must submit an updated NOI to the State Water Resources Control Board (State Board) with the new information (See Attachment 3 of the Permit, NOI Instructions). The State Board processed a certified NOI for your industrial facility on April 1, 1992.

The Permit requires that a permittee develop a Storm Water Pollution Prevention Plan (SWPPP), in which the permittee must specify potential sources of pollution and the site-specific best management practices (BMPs) to eliminate or reduce storm water pollution. The Permit also requires that the permittee implement the SWPPP, maintain a copy of the SWPPP on site and make it available upon request by a Regional Board staff, or any agent thereof.

On November 14, 2001, Ms. Kelly Munoz from Tetra Tech, Inc. (TTI) conducted an inspection of your facility for compliance with the Permit, under the direction of the Regional Board per a contract with the United States Environmental Protection Agency (USEPA). As part of the inspection, the inspector met with the facility representative (Mr. Matt McCoulough), requested to review the SWPPP, and walked through the facility to observe the effectiveness of the BMPs implemented at the facility. The following sections describe the preliminary findings of the inspection. Section numbers in the parentheses are referring to the corresponding sections in the Permit.

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\*\*\*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption\*\*\*  
\*\*\*For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>\*\*\*



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## 1. Facility Description

The facility supplies products for many critical applications in aircraft, submarines, tanks, missiles, space shuttle main engines, and gas turbine engines. Raw materials include vacuum arc remelted steels and all major alloys including titanium, stainless steel, nickel, cobalt and aluminum.

## 2. SWPPP Deficiencies

- 2.1 The facility map was inadequate because it did not indicate sampling points, storm water flow directions, storm drain locations and hazardous material storage areas (§ A4).
  - 2.2 The SWPPP lacked a signed certification page (§ C9).
3. **The facility failed to implement appropriate BMPs to prevent or reduce pollutants in storm water discharges. The inspector observed the following water quality concerns:**
- 3.1 Paints were found in drums mixed with debris and oily rags.
  - 3.2 Hazardous waste was stored outside Building B without proper covers and/or containment.
  - 3.3 A potential unauthorized non-storm water discharge was observed during the inspection. A sump, located close to the southeast corner, had overflowed, with the potential to flow off-site. This water had an oily sheen.
  - 3.4 The storm drain was clogged with an oily rag and other debris.

At the conclusion of the inspection, the inspector discussed with the facility representative (Mr. McCoulough) the above inspection findings. The inspector advised Mr. McCoulough that the facility is in violation of several provisions of the Permit.

### **To come into compliance with the Permit, you are directed to:**

- Immediately update and implement the SWPPP. Your SWPPP must address all requirements specified in the Permit, including Sections A.1 through A.10. By **February 22, 2002**, you must submit one copy of the updated SWPPP to the Regional Board staff listed below.
- Immediately stop discharge of the potentially unauthorized non-storm water. Take immediate measures to improve containment for the sump in the southeast corner.
- Immediately implement appropriate BMPs to address above-listed water quality concerns.

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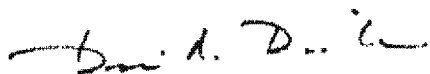
- Immediately improve housekeeping at the facility to clean up the leaves and other debris, and clean up the storm drain.
- Submit a response, by **February 22, 2002**, to the Regional Board staff listed below, indicating that the above measures have been effectively implemented. Regional Board staff will then plan a re-inspection to ensure the full compliance of the Permit.

RoseLynn Wright  
California Regional Water Quality Control Board—Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

**Furthermore, you are hereby advised that you are subject to enforcement action for violations of the Permit. Pursuant to §13385 of the California Water Code, you are liable for administrative civil liability (penalties) of up to \$10,000 per day for each violation and \$10 per gallon of discharge. These penalties may be assessed beginning with the date that the violations first occurred, and may be assessed without further warning.**

Your immediate attention to this violation is required. Should you have questions, you may contact RoseLynn Wright at (213) 576-6634.

Sincerely,



Dennis A. Dickerson  
Executive Officer

cc: Mary Ann Jones, Storm Water Section, State Water Resources Control Board  
Carl Sjoberg, Department of Public Works, County of Los Angeles  
Ed Mino, City of South Gate

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 Street, Apt. No.,  
 or PO Box No. 5321 FIRESTONE BLVD  
 City, State, ZIP+4  
 SOUTH GATE, CA 90280  
 PS Form 3800, January 2001 See Reverse for Instructions

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1. Article Addressed to:

STEVE SHULTZ  
 SHULTZ STEEL CO.  
 5321 FIRESTONE BLVD  
 SOUTH GATE, CA  
 90280

2. Article Number (Copy from service label)

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